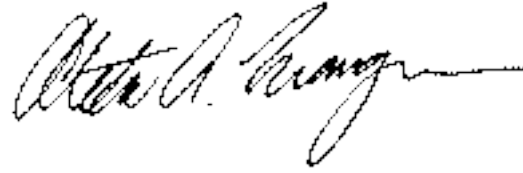


UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



UNITED STATES OF AMERICA

v.

XU ZHANG

Docket: 3:19-00287

DEFENDANT'S MOTION TO UNSEAL COURT CASE

Defendant, Xu Zhang, by and through undersigned counsel, Jennifer Lynn Thompson, respectfully moves this Honorable Court to unseal the court case in the above captioned cause.

For cause the Defendant would show as follows:

- 1) That it is very difficult for Counsel to work on a case when it is sealed.
- 2) That Counsel cannot file pleadings in the captioned matter without taking additional steps to involve Court personnel, nor is undersigned counsel given notice when pleadings have been filed.
- 3) That counsel is not aware of the Government's reason to seal this case, except to be given the explanation that there are "international human trafficking" and gangs watching for cases of this nature to appear.

WHEREFORE, PREMISES CONSIDERED, the said Defendant, Xu Zhang, prays that the Court unsealed the caption matter.

Respectfully submitted,

SIGNATURE TO FOLLOW ON NEXT PAGE